

1
2
3
4
5

6 IN THE UNITED STATES DISTRICT COURT
7 IN AND FOR THE DISTRICT OF NEVADA

8 * * * * *

9 ZYHERE L. FICHMAN,

Case No. 3:19-cv-00292

10 Plaintiff,

11 vs.

12 JOSEPH MERCER, individually and
13 in his official capacity as a
14 Sparks Police Department Officer,
15 CITY OF SPARKS, a municipal
16 corporation, et al.

17 Defendants.

16 STIPULATION AND ORDER GRANTING EXTENSION OF TIME TO ANSWER OR
17 OTHERWISE PLEAD TO COMPLAINT
18 (FIRST REQUEST)

19 COMES NOW, Plaintiff, Zyhere L. Fichman, by and through his
20 undersigned counsel, and Defendant, City of Sparks, a political
21 subdivision of the State of Nevada, and Joseph Mercer, in his
22 individual capacity (hereinafter collectively "the Defendants"),
23 by and through their undersigned counsel and pursuant to LR IA
24 6-1 and LR IA 6-2 hereby stipulate that Defendants shall have a
25 thirty (30) day extension of time to answer or otherwise plead
26 to the Complaint filed and served herein on June 3, 2019, from
27 June 24, 2019, to and including July 24, 2019.

28 This stipulation (first request) is made on the grounds and

1 for the reason that the Defendants have, since the filing and
2 service of the Complaint on June 3, 2019, commenced a thorough
3 investigation of the facts alleged in the Complaint and defenses
4 thereto, including gathering voluminous documents, interviewing
5 numerous witnesses and researching the relevant law. The
6 Defendants believe that an additional thirty (30) days will be
7 sufficient time to complete that investigation to enable them to
8 answer or otherwise plead to the Complaint on file herein.

9 Dated this 20th day of June, 2019.

10

11 /s/Richard Cornell

12 Richard F. Cornell, Esq.
13 William J. Routsis, II, Esq.
14 Attorney for Plaintiff
15 Zyhere L. Fichman


16
17
18
19
20
21
22
23
24
25
26
27
28

Stanley H. Brown, Jr., Esq.
Chester H. Adams, Esq.
Alyson L. McCormick, Esq.
Attorney for Defendants
Joseph Mercer, individually,
and the City of Sparks, a
political subdivision of
the State of Nevada

O R D E R

19 IT IS SO ORDERED.

20

21

22 Dated this 26th day of June, 2019.


United States Magistrate Judge

23 SUBMITTED BY:

24 STANLEY H. BROWN, JR., ESQ.
25 STANLEY H. BROWN, JR., CHARTERED
127 E. LIBERTY STREET
26 RENO, NV 89501
(775) 337-8800